

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Expanding Flexible Use of the 3.7 to 4.2 GHz Band)	GN Docket No. 18-122
)	
Petition for Rulemaking to Amend and Modernize)	RM-11791
Parts 25 and 101 of the Commission’s Rules to)	
Authorize and Facilitate the Deployment of Licensed)	
Point-to-Multipoint Fixed Wireless Broadband)	
Service in the 3.7-4.2 GHz Band)	
)	
Fixed Wireless Communications Coalition, Inc.,)	RM-11778
Request for Modified Coordination Procedures in)	
Band Shared Between the Fixed Service and the)	
Fixed Satellite Service)	

REPLY TO COMMENTS OF T-MOBILE USA, INC.

Meredith Corporation (“Meredith”) filed comments in this proceeding to illustrate how C-band spectrum plays a vital role in the provision of free, over-the-air television and radio service to viewers and listeners nationwide.¹ Other broadcasters and cable operators filed similar comments in which they urged the Commission to proceed carefully as it considers repurposing the C-band, so as not to disrupt important news, weather, sports and entertainment programming for hundreds of millions of American consumers.² Broadcasters, not wireless carriers, are the best means of quickly disseminating life-saving information to the public during times of crisis, and C-band spectrum is used to reach all Americans, especially in rural areas.

¹ *Expanding Flexible Use of the 3.7 to 4.2 GHz Band*, GN Docket No. 18-122, Comments of the Local Broadcasters (filed Oct. 29, 2018) (Comments filed by Block Corporation, Gray Television, Inc. and Meredith Corporation).

² *See, e.g., Expanding Flexible Use of the 3.7 to 4.2 GHz Band*, GN Docket No. 18-122, Comments of Comcast Corporation and NBCUniversal Media, LLC (filed Oct. 29, 2018) at 2.

Wireless carriers, however, refuse to recognize that free programming services are vital to the public interest. Accordingly, in these reply comments, Meredith responds to T-Mobile's naked suggestion that the Commission strip broadcast viewers of access to free, reliable, over-the-air programming in favor of T-Mobile's fee-for-service competitive video offering.³ Without even a hint of modesty, T-Mobile asks that the Commission deprive broadcasters of the reliable, cost-effective means of receiving national programming - such as emergency information, election content, breaking news, and sports - which is distributed using the current C-Band. Instead, T-Mobile urges the Commission to require T-Mobile's video competitors, television broadcasters, to move their long-held satellite dishes to rural satellite farms. Broadcasters are then told to use less-than-reliable fiber optic networks strung through vast areas of desert, swampland, or other harsh terrain to link their broadcast studios, transmitters and towers with far away C-band earth stations. T-Mobile suggests that broadcasters attempt (and likely fail) to replicate a service that works well for Americans today.

THE PUBLIC DESERVES RESILIENCY

The Commission has already noticed, such as in the context of Hurricane Michael and the recent fires in California, that wireless networks such as T-Mobile's are notoriously unreliable in emergencies.⁴ Wireless networks get congested quickly when emergencies occur, and wireless towers need access to other infrastructure like electrical power to remain functional. Broadcasters, in contrast, can efficiently transmit lifesaving information to an entire city or region when the need arises. If, however, the Commission were to adopt T-Mobile's suggestion

³ *Expanding Flexible Use of the 3.7 to 4.2 GHz Band*, GN Docket No. 18-122, Comments of T-Mobile USA, Inc. (filed Oct. 29, 2018).

⁴ *See, e.g., Public Safety and Homeland Security Bureau Seeks Comment on Hurricane Michael Preparation and Response*, Public Notice, DA 18-1176 (rel. Nov. 16, 2018) (noting that electric power was out for extended periods and numerous cell sites were down for more than a week after Hurricane Michael hit Florida in early October).

and force broadcasters to move their C-band earth stations to far flung locations, broadcast viewers and listeners would likely be deprived of satellite-delivered programming from national networks during emergencies. For example, national weather feeds or reporting from nearby DMAs that come in from national networks could be lost. Today, in contrast, due to hardening of broadcast stations, redundancies, and backup generators in a one-to-many model, broadcast stations are more resilient in an emergency than multipoint wireless architecture. If the Commission cares about the dissemination of breaking emergency information to the public, it will not adopt T-Mobile's proposal.

T-MOBILE IGNORES CONSEQUENCES TO THE PUBLIC

Meredith specifically objects to T-Mobile's "Phoenix Study" in which T-Mobile purports to demonstrate "the feasibility of clearing all earth station use within 60 kilometers of the Phoenix cellular market area ("CMA")."⁵ Meredith has two stations, KPHO and KTVK, in Phoenix. T-Mobile suggests that Meredith move its C-Band dishes to a remote area approximately 60 km outside of Phoenix, and then use unreliable, expensive, and difficult to repair fiber optic cable strung through vast desert to deliver important signals to Meredith's television stations. Putting aside that T-Mobile's Phoenix Study grossly underestimates the number of C-band receive sites in Phoenix (because the study was completed far before the C-band earth station registration deadline put forth by the Commission), it also underestimates, or rather fails to estimate at all, the impact on resiliency of their proposal. If the fiber line were to be cut, or electricity were to go out, the signal would be lost. It could be vandals, or an earthquake, or just a desert animal, and then a third party fiber service provider would be

⁵ T-Mobile Comments at 9-10.

searching for an outage over a long string of fiber in a rural area. It could be days, weeks, or months before service could be restored for broadcasters and their viewers.

T-MOBILE'S PROPOSAL SHOULD BE REJECTED

The Commission should view T-Mobile's proposal for what it is: an attempt to harm a video competitor by bogging them down with an inferior service delivery model and additional costs while moving Americans from high-quality free over-the-air television to T-Mobile's pay-for-service product. Put simply, T-Mobile's proposal is not in the public interest. It is only in T-Mobile's self-serving interest. That is not the Commission's charge.

Respectfully submitted,

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